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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

DON'T SHOOT PORTLAND, et al.

Plaintiffs

v.

CITY OF PORTLAND, a municipal
corporation,

Defendant.

Case No. 3:20-cv-00917-HZ

DECLARATION OF MADDIE NGUYEN IN
SUPPORT OF PLAINTIFF'S MOTION FOR
CLASS CERTIFICATION
ORAL ARGUMENT REQUESTED


I, Maddie Nguyen, declare as follows pursuant to 28 USC § 1746:

1. I have personal knowledge of the information contained in this declaration. If called upon to do so, I could and would competently testify regarding the matters set forth herein.
2. On August 7th, 2020, I was involved in a demonstration that started at the Portland Police Bureau's east precinct. There were about 20 to 30 protestors. The protest started at dusk.
3. Police reacted by forming a line and slowly coming toward us which caused us to move back. They seemed to want us to move away from the precinct. We wound up being moved in this way north to SE Stark St. and then east on SE Stark eventually we wound up at Ventura Park.
4. At the park protestors standing around, some were yelling things at the police who eventually formed a line. When police formed a line, the protestors also formed a line opposite the police, the two groups were about 20 to 30 feet apart, there was some verbal back and forth, and I was dancing in place, not engaged in any sort of threatening activity, neither were any of the other protestors that I could see.

5. While I was dancing, I was shot with a rubber bullet in the right knee. It felt like I had been bit by an animal. But I did not know I had been shot until a few minutes later when I looked at my knee and saw the injury.
6. I noticed an object on the ground that resembled a marble.
7. My knee hurt that night but the next day I had to call in sick from work because I could not put any weight on my right leg. The bruise and tenderness lasted for about one week.
8. Overall, I attended many protests between the end of May to the end of September of 2020.
9. I attended demonstrations with a group of friends. The group started out as four people grew to nine people at its peak and then dwindled back to four. We had an agreement to watch each other's backs because of the increasing risk. We used a buddy system for that purpose. As the weeks and months passed more of our group's members started to feel burned out and scared. After a certain point some members of our group dropped out because of the constant fear of violence at the hands of the police.
10. With the ranks of our group dwindling, we decided to stop going to demonstrations as it was just too dangerous.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 5, 2022


Maddaine Nguyen (Jan 6, 2022 15:08 PST)

MADDIE NGUYEN